



Holcim Air Permit Issuance Frequently Asked Questions

Air Pollution Control Program fact sheet

6/2004

Will the Holcim facility harm air quality or public health?

Any air permit issued by the department allows a facility to emit some amount of air pollution. It is the department's job to ensure the air pollution will not harm public health or cause an area to violate clean air standards. Holcim is no exception. The department has made every effort to ensure the conditions placed in the permit are protective of public health and air quality standards, including achieving significant reductions in oxides of nitrogen (NO_x) from Holcim's original proposal.

Will approval of this permit affect St. Louis air quality with respect to ozone?

Any large source of emissions of oxides of nitrogen (NO_x) located upwind of the St. Louis area has such potential. Oxides of nitrogen react in the atmosphere under warm climate conditions to form ground-level ozone. Oxides of nitrogen are capable of travelling long distances. Consequently, sometimes air quality problems occur far downwind from the actual source of NO_x emissions. The department has evaluated the potential impact of the proposed Holcim facility due to the magnitude of its NO_x emissions. The department used computer modeling to estimate impacts and placed conditions in the permit to address the predicted impacts.

The permit contains conditions to reduce Holcim's effect on St. Louis to an insignificant level. Because the concentration of NO_x emissions are greater during the ozone season, April 1 through October 31, the permit contains very strict NO_x emissions during the ozone season. The permit also requires an additional emission reduction of NO_x after a few years of operation. Holcim proposed to use Selective Non-Catalytic Reduction (SNCR), an add-on control, to further reduce NO_x emissions.

What is the department doing to ensure protection for air quality?

The proposed Holcim facility is subject to federal and state rules that apply to sources proposing to build in areas that meet all air quality standards. These rules are called Prevention of Significant Deterioration (PSD) rules. The PSD rules require a facility to install pollution controls based on a Best Available Control Technology (BACT) analysis. In the permit, BACT for oxides of nitrogen is multi-staged combustion, which is control inherent in the production process.

However, to address the predicted impacts of Holcim's facility on the St. Louis area, the permit requires Holcim to further reduce nitrogen oxides emissions beyond the BACT emission rate. Holcim is required to limit nitrogen oxide emissions during the ozone season, May to October.

In addition, after only a few years of operations Holcim is required to reduce its annual nitrogen oxide emissions to a lower level than the BACT emission rate. Holcim proposes to meet these limits through the use of Selective Non-catalytic Reduction (SNCR). However, even if Holcim has technical difficulty with this control and determines this technology is not feasible on its plant, Holcim must meet these reduced emission limitations through other means, such as alternative control technologies or change in operation of the cement plant.

How does Holcim affect St. Louis' ability to attain the 8-hour ozone standards?

The emission limitations imposed by this permit will control emissions of pollutants that contribute to ozone pollution. The department does not have analytical tools available to predict Holcim's impact on the St. Louis attainment of the 8-hour ozone standard. However, the department analyzed, with the tools available, all standards in effect in Missouri at the time of the permit review.

Even though the federal government has established air quality standards for 8-hour ozone, the U.S. EPA is only enforcing that standard in areas officially designated with a specific nonattainment status. At the time of Holcim's application, EPA had not designated any areas in Missouri with regard to the 8-hour ozone standard. On April 15, 2004, the EPA designated the St. Louis metropolitan area as nonattainment for the 8-hour ozone standard. Ste. Genevieve County, where Holcim will be located, was not included as part of the nonattainment area.

Why was an Environmental Impact Statement not completed before issuing the permit?

Due to broad impacts of this project, Gov. Bob Holden requested the Corps of Engineers to conduct an Environmental Impact Statement (EIS). The Corps of Engineers refused to prepare an EIS, contending it was not needed. Current law does not give the state the authority to require an EIS.

A facility seeking an air permit from the department is also not required to complete an EIS. An EIS is a federal requirement under the National Environmental Policy Act and is required for a major federal action that significantly affects the quality of the human environment.

What other permits has the department issued to Holcim?

The department has already issued several permits including a Clean Water Act Section 401 water quality certification, a Land Reclamation Permit Expansion, a Missouri State Operating Permit for storm water discharge, a Dam Safety Construction Permit, and Construction Authorization for a nontransient-non community drinking water supply well. Holcim will be subject to additional permit and regulatory requirements throughout the operation of the plant. In addition to the department's permits, the U.S. Army Corps of Engineers issued a Clean Water Act Section 404 and a Rivers and Harbors Act Section 10 permit for the project. Ste. Genevieve County has issued a Floodplain/Floodway Development Permit for the project.

Now that the department has issued the permit, what actions are available to those who object to conditions of the permit?

Missouri air regulations allow any aggrieved party to appeal the permit decision. Please send any notice of appeal to the Missouri Air Conservation Commission at P.O. Box 176, Jefferson City, MO 65102, or fax to (573) 751-2706 by 5 p.m. on July 9, 2004.

For More Information

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